

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ELZIE TURNER,
Plaintiff

v.

**GEICO ADVANTAGE INSURANCE
COMPANY,**
Defendant

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Case No. 6:17-cv-00581-RWS

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

COMES NOW Plaintiff Elzie Turner and Defendant GEICO Advantage Insurance Company and files this Joint Motion to Stay All Deadlines and Notice of Settlement and would respectfully show as follows:

Plaintiff and Defendant hereby notify the Court that all matters in controversy have been fully and finally settled in the above cause number as well as the severed case (Cause No. 6:18-cv-00091-RWS) for the total sum of \$300,000. Defendant has prepared the final settlement documents to be executed by Plaintiff. Plaintiff's counsel is in the process of obtaining approval of the settlement in this case with the bankruptcy trustee appointed in Case No. 14-60797 (In Re: Elzie Turner) filed in The United States Bankruptcy Court for the Eastern District of Texas, Tyler Division, necessitating more than 30 days to complete the settlement. Plaintiff and Defendant contemplate that all documents shall be exchanged, and funds tendered within sixty (60) days or sooner. Plaintiff and Defendant respectfully request that the Court stay all unreach deadlines contained in the Court's Docket Control Order for sixty (60) days so to

effectuate a dismissal with prejudice. The parties stipulate that if any issues arise in formalizing the settlement papers, the parties agree to submit such issues to the Court for final resolution.

Respectfully submitted,

/s/ Fred Nix

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on the following counsel of record on the 1st day of June 2018 in accordance with the FEDERAL RULES OF CIVIL PROCEDURE:

Via Electronic Service

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